

CITATION

RETURN

MICHAEL V RAYNOLDS

Versus

MOHAMED M LICAR, ET AL



Case: 37261

Division:

39th Judicial District Court

Parish of Red River

State of Louisiana

PLEASE SERVE:

PRO OIL AND GAS SERVICES LLC
THROUGH AGENT FOR SERVICE - CURT OCKMAN
2043 COTEAU RD
HOUMA, LA 70364

YOU ARE HEREBY CITED TO COMPLY WITH THE DEMAND CONTAINED IN THE PETITION FOR DAMAGES, OF WHICH A CERTIFIED COPY ACCOMPANIES THIS CITATION, OR DELIVER YOUR ANSWER THERETO IN WRITING TO THE OFFICE OF THE CLERK OF THE 39TH JUDICIAL DISTRICT COURT, RED RIVER PARISH, TOWN OF COUSHATTA, WITHIN FIFTEEN (15) DAYS AFTER SERVICE HEREOF. YOU MAY FILE YOUR WRITTEN ANSWER OR PLEADING IN PERSON OR BY MAIL—(Clerk of Court; PO Box 485, Coushatta, LA). IF YOU FILE BY MAIL, THE PLEADING MUST BE RECEIVED BY THE 15TH DAY. YOUR FAILURE TO COMPLY WILL SUBJECT YOU TO THE PENALTY OF ENTRY OF DEFAULT JUDGMENT AGAINST YOU.

AND HEREIN FAIL NOT UNDER PENALTY OF THE LAW.

WITNESS MY OFFICIAL HAND AND SEAL OF OFFICE, on this the 20TH day of August, 2018.

Requested by: P-1

PERSONAL THRU

8-27-18 12:50 PM

ANNA Gaudet

By Kenneth Landry

STUART SHAW, CLERK OF COURT

BY:

Deputy Clerk of Court

Service Information

Received on the _____ day of _____, 20____ and on the _____ day of _____, 20____ served the above named party as follows:

Personal Service on the party herein named _____

Domiciliary Service on the party herein named by leaving the same at his/her domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his/her residence at the time of said service.

Returned:

Parish of _____ this _____ day of _____, 20____.

Service \$ _____

Mileage \$ _____

Total \$ _____

By: _____
Deputy Sheriff

PARISH OF TERREBOINE LA

2018 AUG 23 A 9 22

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[ORIGINAL]

EXHIBIT "A"

MICHAEL V. REYNOLDS

*

NUMBER: 37261

VERSUS

*

39TH JUDICIAL DISTRICT COURT

**MOHAMED M. LICIAR and
PRO OIL AND GAS SERVICES, LLC**

*

RED RIVER PARISH, LOUISIANA

PETITION FOR DAMAGES

The petition of MICHAEL V. REYNOLDS, a major resident and domiciliary of Bienville Parish, Louisiana respectfully represents:

1.

Made defendants herein:

- A. MOHAMED M. LICIAR, who is an individual domiciled in Fort Bend County, Richmond, Texas.
- B. PRO OIL AND GAS SERVICES, LLC., a company doing business in Louisiana, with their principal business office and registered office located in Houma, Louisiana.

2.

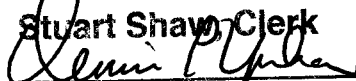
Venue is proper in this Court in that the accident occurred in Coushatta, Red River Parish, Louisiana.

3.

On April 4, 2018, MICHAEL V. REYNOLDS was traveling North bound on US 71 in a 1996 Toyota Camry. MOHAMED M. LICIAR was traveling South bound on US 71 in a 2017 Ford F250. MOHAMED M. LICIAR crossed over the centerline into the opposing travel lane directly in front of MICHAEL V. REYNOLDS. MICHAEL V. REYNOLDS veered off the right side of the road in order to avoid a head-on collision with MOHAMED M. LICIAR. MICHAEL V. REYNOLDS lost control of his vehicle colliding with a utility pole and subsequently impacted an embankment. MOHAMED M. LICIAR did not stop and continued driving South bound on US 71. There were two (2) eyewitnesses on the shoulder of the southbound lane. As a result of MOHAMED M. LICIAR'S failure to abide by the traffic laws, MICHAEL V. REYNOLDS lost control of his vehicle and collided with a utility pole and embankment.

4.

As a result of the collision, MICHAEL V. REYNOLDS suffered injuries and his vehicle sustained damages.

ATTEST A TRUE COPY
Stuart Shaw, Clerk

Deputy Clerk/39th JDC

5.

The sole and proximate cause of the accident and resulting injuries sustained by him were caused by the negligence, fault and/or strict liability of MOHAMED M. LICIAR in the following non-exclusive particulars, among others to be shown at the trial hereof:

- A. Driving left of center;
- B. Being inattentive while driving his vehicle;
- C. Failure to control his vehicle;
- D. Failure to observe and see vehicles;
- E. Failure to keep a proper lookout;
- F. Failure to take any steps whatsoever to avoid the accident;
- G. Violating the motor vehicle and traffic laws and ordinances of the State of Louisiana, Parish of Red River; and other acts of negligence as will be proven at the trial of this cause.
- H. For other such reasons to be shown at the trial hereof.

6.

MOHAMED M. LICIAR was in the scope of his employment with PRO OIL AND GAS SERVICES, LLC. at all times relevant herein. PRO OIL AND GAS SERVICES, LLC. is vicariously liable for the negligent acts of its employee.

7.

It will be necessary to use medical and expert witnesses at the trial of this case, and their fees together with any expenses for taking of their depositions should be fixed and taxed as costs.

8.

As a result of the above described accident, MICHAEL V. REYNOLDS has sustained the following damages, among others to be shown at the trial hereof:

- A. Physical pain and suffering (past, present and future);
- B. Loss of enjoyment of life (past, present future);
- C. Loss of earning capacity (past, present and future);
- D. Mental anguish, humiliation and embarrassment;
- E. Emotional distress;
- F. Medical expenses (past, present and future);
- G. Lost wages;

- H. Interest;
- I. Property Damages and loss of value to vehicle; and
- J. Costs.

WHEREFORE, MICHAEL V. REYNOLDS PRAYS that there be service and citation hereof upon the defendants, MOHAMED M. LICIAR and PRO OIL AND GAS SERVICES, LLC, in accordance with law, that after all legal delays and due proceedings had, there be judgment herein in favor of MICHAEL V. REYNOLDS and against defendants, MOHAMED M. LICIAR and PRO OIL AND GAS SERVICES, LLC, in solido, in such amounts as are proven to be due to justly compensate petitioner for monies paid, together with legal interest from the date of judicial demand until paid and for all costs of these proceedings.

FURTHER PRAYS for all orders and decrees necessary for general and equitable relief.

KAMMER & HUCKABAY, LTD (A.P.L.C.)

BY: 

Charles H. Kammer, III - Bar #21658
820 Jordan, Suite 480
Shreveport, Louisiana 71101
(318) 222-0293 - Telephone
(318) 425-1644 - Facsimile
Pete@kandhlawoffice.com

ATTORNEY FOR MICHAEL V. REYNOLDS

PLEASE SERVE WITH THE ATTACHED DISCOVERY:

1. **MOHAMED M. LICIAR**
21622 Palaramo Court
Richmond, Texas 77407
2. **PRO OIL AND GAS SERVICES, LLC.**
Through its registered agent
Curt Ockman
2043 Coteau Road
Houma, Louisiana 70364

MICHAEL V. REYNOLDS

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NUMBER:

VERSUS

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39TH JUDICIAL DISTRICT COURT

MOHAMED M. LICIAR and
PRO OIL AND GAS SERVICES, LLC

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RED RIVER PARISH, LOUISIANA

AFFIDAVIT

STATE OF LOUISIANA

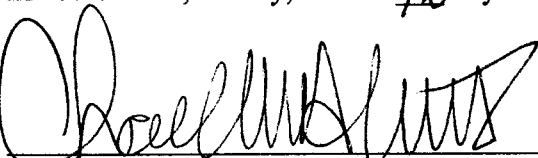
PARISH OF CADDO

BEFORE ME, the undersigned authority, personally came and appeared MICHAEL V. REYNOLDS, who, after first being duly sworn, did depose and say:

That he is the petitioner in the above and foregoing petition, that he has read same, and that the allegations contained therein are true and correct to the best of his knowledge, information and belief.


MICHAEL V. REYNOLDS

SWORN TO AND SUBSCRIBED before me, Notary, on this 16 day of August,
2018.


NOTARY PUBLIC

Charles H. Kammer, III
Number: 21658